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6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 GRACE CAMPBELL,

9 Plaintiff,

CASE NO. C10-1579 JCC

10 v.

11 CATHOLIC COMMUNITY SERVICES OF
12 WESTERN WASHINGTON,

DECLARATION OF JUDITH A.
LONNQUIST IN SUPPORT OF
PETITION FOR REASONABLE
ATTORNEYS' FEES

13 Defendant.

14 Judith A. Lonnquist, being first duly sworn, declares as follows:

15 INTRODUCTION

16 1. I have been asked by Gordon Thomas Honeywell, LLP, to offer opinions on the
17 reasonableness of the hourly rates of James Beck, Andrea McNeely, and of their associates
18 and paralegal, respectively. In preparing this opinion, I have reviewed biographical
19 information about each of the identified attorneys. I have also reviewed the pleadings in this
20 case, including the Plaintiff's Response to Defendant's summary judgment motion and the
21 Court's order on summary judgment.
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23 2. For the reasons given below, I believe that Mr. Beck's hourly rate of \$350, Ms.
24 McNeely's rate of \$325, former associate Christine Sanders' hourly rate of \$250, Andre
25 Penalver's hourly rate of \$225, and their paralegal's hourly rate of \$125 are all reasonable,
26 and within the market rate.

1 QUALIFICATIONS

2 3. I was admitted to practice before the Washington Bar in 1975. I was admitted to the
3 Bar of the State of Illinois in 1966 and to the Federal Bar the same year. I am admitted to the
4 Bars of the United States Supreme Court, and to the Courts of Appeals for the Second, Third,
5 Fourth, Fifth, Seventh, Eighth, Ninth, Tenth and District of Columbia Circuits, each
6 admission attendant to cases presented. I practiced employment and labor law in Chicago
7 from 1966 to 1975 and have practiced in the same specialty in Washington continuously since
8 establishing residency in 1975. I received a A.B. from Mount Holyoke College in 1962 and a
9 J.D. from the University of Chicago Law School in 1965.

10 4. From 1972 to 1976, I served as the National Legal Vice President to the National
11 Organization for Women, and as a member of the Board of Trustees of the NOW Legal
12 Defense and Education Foundation. In my capacity as NOW Legal Vice President, I
13 coordinated a national legal program, working with and overseeing EEO lawyers across the
14 United States who were handling NOW cases. I also coordinated litigation efforts between
15 NOW and NAACP, MALDEF, and other civil rights organizations. I am a graduate of Gerry
16 Spence's Trial Lawyers College. I have served as the Chair of the Washington Employment
17 Lawyers Association and as Treasurer for the Washington State Trial Lawyers Association. I
18 have been the Editor-in-Chief of both editions of the Washington Employment Law
19 Deskbook, published by the Washington Association of Justice in 2004 and 2009.

20 5. Since 1969, I have testified before State and Federal legislatures concerning EEO
21 legislation, drafted bills and rendered advice on legislative strategy for civil rights efforts;
22 have taught classes on Title VII of the Civil Rights Act and related laws; have been a
23 speaker, trainer and workshop presenter on EEO matters, and recovery of attorneys' fees.
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1 6. Since at least 1967, I have represented plaintiffs in both State and Federal courts and
2 administrative agencies in cases involving claims of discrimination on the basis of sex, age,
3 race, marital status, disability, and national origin, and of retaliation and constructive
4 discharge.

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6 7. I have testified by affidavit as an expert in a number of cases about the reasonableness
7 of fees requests. As an original member of the Washington State Gender & Justice Task
8 Force, I chaired a subcommittee that studied awards of attorneys' fees in federal and State
9 cases brought pursuant to RCW 49.60. I have petitioned for and recovered fees in
10 discrimination cases from many judges of the King, Thurston, and Snohomish County
11 Superior Courts, and numerous other State and federal trial courts, including this court. I am
12 very familiar with how fee awards in employment cases are computed and with the market
13 rates for employment lawyers in Western Washington.
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15 **REASONABLENESS OF HOURLY RATES**

16 8. I believe that the hourly rates for plaintiffs' attorneys and paralegal: namely, \$350 for
17 Mr. Beck, \$325 for Ms. McNeely, \$250 for Ms. Sanders, \$225 for Mr. Penalver and \$125 for
18 their paralegal are reasonable and well within the market rate for lawyers with comparable
19 experience and training.
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21 **EXPERIENCE, REPUTATION AND ABILITY OF THE ATTORNEYS**

22 9. James Beck is a partner in Gordon Thomas Honeywell LLP, serving on the firm's
23 Board of Directors since 2010. I note that Mr. Beck is a summa cum laude graduate of
24 Georgia State University School of Law and a former law clerk to Washington Supreme
25 Court Chief Justice Gerry Alexander. Mr. Beck also has extensive trial experience, including
26 representation of a number of individuals in significant employment cases. He has been a

1 frequent author and speaker on labor and employment issues. In the Employment Law
2 Deskbook published by the Washington Association for Justice, of which I was the editor, he
3 authored the chapter on Military Service Discrimination, a brilliant and thoughtful analysis of
4 the topic.

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6 10. Ms. McNeely is a partner in Gordon Thomas Honeywell LLP and a graduate of Seattle
7 University School of Law, *magna cum laude*. While in law school, Ms. McNeely served as a
8 judicial extern to the Honorable Ronald B. Leighton, U.S. District Court for the Western
9 District of Washington.

10 12. Mr. Penalver graduated from Harvard College and then attended Cornell Law School,
11 graduating in 2010. After graduation, Mr. Penalver began work for Gordon Thomas
12 Honeywell LLP as a litigation associate.

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14 13. Ms. Sanders graduated *magna cum laude* from Seattle University School of Law in
15 2008.

16 14. All of these lawyers appear to have sterling reputations and excellent experience as
17 civil litigators.

18 **THE CUSTOMARY FEE**

19 15. Based on my knowledge of prevailing rates among attorneys in Western Washington
20 who do employment related litigation, and my personal knowledge of fees awarded to my
21 firm by the various courts, it is my professional opinion that the rates requested herein by
22 plaintiff's lawyers herein are reasonable.

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24 16. My firm charges \$125 per hour for our paralegal. This rate has been upheld by several
25 courts in fee petitions that I have submitted in the past years. I believe that \$125/hour for a
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1 skilled and experienced employment law paralegal is reasonable and well within market rates
2 for such staff.

3 **TIME EXPENDED ON THIS DECLARATION**

4 16. I have expended 3.5 hours on reviewing files and documents, conferring with counsel
5 and preparing this Declaration. My hourly rate for such expert testimony is \$550.00 per hour.
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7 I request that the fee award herein include payment of my fees in the amount of \$1,925.00.

8 DATED this 15th day of May, 2012.

9 LAW OFFICES OF
10 JUDITH A. LONNQUIST, P.S.

11 /s/ Judith A. Lonnquist
12 Judith A. Lonnquist, WSBA No. 06421
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CERTIFICATE OF SERVICE

I hereby certify that I served the attached DECLARATION OF JUDITH A. LONNQUIST
IN SUPPORT OF PETITION FOR REASONABLE ATTORNEYS' FEES by causing the same to
be served by CM/ECF e-service on counsel for defendant at tmerrick@mhlseattle.com
and tnelson@mhlseattle.com.

Dated this 17TH day of May, 2012

By: /s/ Jennifer Milsten-Holder
Jennifer Milsten-Holder
Gordon Thomas Honeywell LLP